

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	
	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	
	)	

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**CREDITOR AFSCME COUNCIL 25's SECOND SUPPLEMENTAL  
SUBMISSION IN SUPPORT OF PROOF OF CLAIM 2958 PURSUANT TO  
SECTIONS 105 AND 502(b) OF THE BANKRUPTCY CODE  
3007 AND LOCAL RULE 3007-1**

NOW COMES Creditor, AFSCME Council 25, by and through its attorneys,  
with its Second Supplemental Submission in Support of Proof of Claim 2958, and  
states as follows:

AFSCME attaches the Proposed Ordinance to Amend Chapter 47 of the 1984  
Detroit City Code, promulgated by the City on November 8, 2011 (Exhibit A). The  
Notice attaches the changes to the Code which the City made November 30, 2011.  
The pertinent section is Section 47-2-18, entitled Method of Financing, which  
includes paragraph (g), entitled Income Fund, where the ordinance revision  
eliminated the discretion of the Board to “transfer[]” “excess” funds beyond that  
needed “to cover current charges to the fund”.

As the Court evaluates the merits of the City's Supplemental Objection, filed October 16, 2014, Creditor again requests discovery followed by an evidentiary hearing, and all other rights of Federal Rule of Bankruptcy Procedure, Rule 9014.

## **I. CONCLUSION**

WHEREFORE, the Coalition of Detroit Unions respectfully requests that this Honorable Court overrule the City of Detroit's Objections.

Dated: October 17, 2014

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